

AO-91 (Rev. 8/01) Criminal Complaint

OCT 15 2015

## UNITED STATES DISTRICT COURT

Clerk of Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA  
V.

## CRIMINAL COMPLAINT

Case Number: M-15-1807-MJulio Cesar VARGAS HERNANDEZ  
YOB: 1969  
Mexican Citizen

I, the undersigned complainant state that the following is true and correct to the best of my

Knowledge and belief. On or about October 14, 2015 in Hidalgo County, in  
(Date)  
the Southern District of Texas Defendant(s) did,

Possession with the intent to distribute approximately 17.72 kilograms of cocaine

in violation of Title 21 United States Code, Section(s) 841.I further state that I am a(n) Special Agent And that this complaint is based on the  
Official Title

following facts:

See Attachment "A"

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Jean-Paul Reneau, HSI Special Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

10-15-15

Date

At

McAllen, Texas

City and State



Signature of Judicial Officer

U.S. Magistrate Judge, Dorina Ramos

Name and Title of Judicial Officer

**Attachment "A"**

On October 14, 2015, Julio Cesar VARGAS-Hernandez attempted to make entry into the United States via the Pharr, Texas Port of Entry (POE). During primary inspection, members of the United States Customs and Border Protection Office (CBP) Officers smelled fresh paint emitting from VARGAS-Hernandez's vehicle. VARGAS-Hernandez was referred for secondary inspection after providing CBP Officers a negative declaration. During secondary inspection a canine positively alerted to presence of an order consistent with narcotics emitting from the front passenger area of the vehicle. A further inspection of the vehicle being operated by VARGAS-Hernandez resulted in the discovery of approximately 16 bundles of a white powdery substance which field tested positive for the characteristics of cocaine. The cocaine was found to weigh approximately 17.72 kilograms.

HSI special agents provided VARGAS-Hernandez a copy of his Miranda Rights in Spanish, both orally and written, VARGAS-Hernandez agreed to waive those rights by signing a form and orally stating that he was willing to speak to agents without an attorney present. VARGAS-Hernandez claimed that he had previously transported narcotics from Mexico to the United States on one (1) other occasion. VARGAS-Hernandez claimed that on October 14, 2015, he was traveling to the United States transporting narcotics to an unknown location somewhere in the United States. VARGAS-Hernandez claimed that he was forced to pay an unknown criminal organization in Mexico to operate his business. VARGAS-Hernandez stated that he was not able to pay the money, so he agreed to transport the narcotics in lieu of payment.